



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-2457 FAX (603) 271-7894



Ms. Hanna Rose
River Valley Club
33 Morgan Dr
Lebanon, New Hampshire 03766

LETTER OF DEFICIENCY
WMB PBF 02-69
October 7, 2002

Dear Ms. Rose

The Department of Environmental Services, Water Division ("DES") is required by RSA 485-A:26 to operate a program to ensure the health and safety of the public when using public bathing facilities such as pools and spas. To implement this program, DES has adopted administrative rules Env-Ws 1101-1105 to specify the design, operation, and maintenance requirements for public bathing facilities. DES reviews applications for new public bathing facilities and also inspects and tests the water in existing public bathing facilities to ensure that applicable requirements are being met.

On October 2, 2002, DES inspected the following public bathing facilities at the River Valley Club, in Lebanon, NH: (a) the indoor lap pool, ("Lap Pool"); (b) the indoor recreational pool, ("Rec. Pool"); (c) the indoor coed spa ("Coed Spa"); (d) the spa inside the men's locker room ("Men's Spa"); (e) the spa inside the women's locker room ("Women's Spa"); the cold water pool ("Cold Plunge") and (f) the outdoor pool ("Outdoor Pool").

During this inspection, the following deficiencies were noted:

A recommendation to close and drain the Men's Spa was issued on October 3, 2002. The inspection on October 2, 2002 revealed that the Men's Spa was in violation of Env-Ws 1103.14 and unsafe for public use. The following bacterial violations were observed in the Men's Spa water:

- a. Pursuant to Env-Ws 1103.14(a)(2) the maximum allowable Heterotrophic Plate Count (HPC) in public bathing facility water is five hundred colony-forming units per one milliliter (500 cfu/mL). The Men's Spa water contained 1,770 cfu/mL.
- b. The maximum allowable concentration of non-coliform bacteria in public bathing facility water is two hundred counts per one hundred milliliters (200 CTS/100mL). The Men's Spa water contained greater than 200 CTS/100mL.
2. Env-Ws 1103.16(e) requires a free residual chlorine concentration between 2.0 mg/L and 5.0 mg/L in public spa water, with an absolute maximum of 10 mg/L chlorine. The chlorine concentration of the Men's Spa water was less than 0.1 mg/L on October 2, 2002. The chlorine concentration of the Coed Spa water was 1.8 mg/L on October 2, 2002.
3. Env-Ws 1103.15(c) requires a free residual chlorine concentration between 1.0 mg/L and 3.0 mg/L in public pool water. The free chlorine residual of the Cold Plunge water was 0.1 mg/L on October 2, 2002.
4. Env-Ws 1103.16(f) requires a pH between 7.0 and 7.8 in public spa water. The pH of the Men's Spa water was 8.2 on October 2, 2002. The pH of the Coed Spa water was 8.4 on October 2, 2002.
5. Env-Ws 1103.15(d) requires a pH between 7.0 and 7.8 in public pool water. The pH of the Cold Plunge water was 5.4 on October 2, 2002. The pH of the Rec. Pool water was 8.0 on October 2, 2002.
6. Pursuant to Env-Ws 1103.15(a), disinfection of pool water shall be achieved by positive displacement pump type unit providing hypochlorination or by an erosion unit using either hypo-chlorite or bromine tablets with control of the erosion rate. The Outdoor Pool is currently being disinfected by hand feeding.
7. Env-Ws 1105.01(j) requires a rope with attached floats a ("breakpoint safety line") to be placed across public pools over the break in depth between the shallow and deep portions of the pool. A breakpoint safety line was not present in the Outdoor Pool at the time of the inspection. A breakpoint safety line was not present in the Rec. Pool at the time of the inspection.

- 8 Pursuant to Env-Ws 1104.03(c), signs shall provide the location of the nearest telephone. The location of the nearest telephone was not posted at the Outdoor Pool at the time of the inspection.
9. Env-Ws 1105.01(k)(19) requires pool filtration systems to include a flow meter. The filtration systems for the following pools did not include functioning flow meters: the Rec. Pool; Lap Pool; Outdoor Pool; and the Cold Plunge.
10. Env-Ws 1105.03(d)(2) requires spa filtration systems to include a flow meter. The filtration systems for the Coed Spa and Men's Spa did not include functioning flow meters.

A report outlining how compliance will be achieved with the cited deficiencies should be submitted to DES within 30 calendar days from receipt of this letter. The report should include the following:

- 1 A copy of two weeks of water quality test results for all facilities (please do not send originals).
2. The type, manufacture, and model of the chlorine feeder to be installed.
- 3 The type, manufacture, and model of the flow meter(s) to be installed.
4. A timetable of when:
 - a. the safety items will be in place;
 - b. the installation of the chlorine feeder will be completed; and
 - c. the installation of the flow meter(s) will be completed.

DES personnel will conduct another inspection at a later date to determine whether you have come into, and are maintaining, full compliance with RSA 485-A:26 and Env-Ws 1101-1105. After a violation of Env-Ws 1103.14, the facility will be required to pass two inspections in the following months. In the event that compliance is not achieved, DES may take further action, including seeking an administrative fine up to \$2,000 for each offense or referring the case to the NH Attorney General's Office for judicial action.

We appreciate your cooperation in this matter. Please contact Amy Wilson at (603) 271-7108 if you have any questions regarding this letter. Copies of Env-Ws 1101-1105 are available through the DES Public Information Center at (603) 271-2975 or via the Internet at <http://www.des.state.nh.us/pools/env1100.pdf>.

Sincerely,

COPY
Jody Connor
Limnology Center Director

Certified Mail # 7099 3400 0002 9770 1284

cc: Mark Harbaugh, Enforcement Attorney, DES
Amy Wilson, Public Bathing Facility Coordinator, DES
Calvin Hunnewell, Health Officer, Town of Lebanon

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